

1 **GEORGE K. CHEBAT (034232)**

2 George@EnaraLaw.com

3 **JOSEPH J. TOBONI (031385)**

4 Joseph@EnaraLaw.com

5 **DANIEL DE JULIO (035854)**

6 Danny@Enaralaw.com

7 **Enara Law PLLC**

8 7631 East Greenway Road, Suite B-2

9 Scottsdale, Arizona 85260

10 Filings@EnaraLaw.com

11 Telephone: (602) 687-2010

12 *Attorneys for Plaintiff*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF ARIZONA**

15 Valentino Dimitrov, individually, and on
16 behalf of all others similarly situated;

17 Case No.: 2:23-CV-00226-PHX-DJH

18 Plaintiffs,

19 vs.

20 Stavatti Aerospace, Ltd, a Minnesota
21 corporation; Stavatti Aerospace, Ltd, a
22 Wyoming corporation; Stavatti Corporation,
23 a Minnesota corporation; Stavatti
24 Immobiliare, Ltd, a Wyoming corporation;
25 Stavatti Industries, Ltd, a Wyoming
corporation; Stavatti Niagara, Ltd, a New
York corporation; Stavatti Super Fulcrum,
Ltd, a Wyoming corporation; Stavatti
Ukraine, a Ukrainian business entity; Stavatti
Heavy Industries Ltd, a Hawaii corporation;
Christopher Beskar and Maja Beskar,
husband and wife; Brian Colvin and Corrina
Colvin, husband and wife; John Simon and
Jean Simon, husband and wife; William
Mcewen and Patricia McEwen, husband and
wife; Rudy Chacon and Jane Doe Chacon,
husband and wife; and DOES 1 through 10,
inclusive,

26 **PLAINTIFF'S APPLICATION FOR
ENTRY OF DEFAULT AGAINST
DEFENDANTS STAVATTI
CORPORATION, CHRISTOPHER
BESKAR, PATRCIA MCEWEN,
WILLIAM MCEWEN, AND JEAN
SIMON**

27 Defendants.

1 Plaintiff Valentino Dimitrov (“Plaintiff”) requests the Clerk of Court enter default
2 against Defendants Stavatti Corporation, a Minnesota Corporation; Christopher Beskar;
3 Patricia McEwen and William McEwen, husband and wife; and Jean Simon (collectively,
4 “Defendants”) pursuant to Fed. R. Civ. P. 55(a).

5 In support of this request, Plaintiff relies on the record in this case and the affidavit
6 submitted as **“Exhibit A”**.

7
8 **RESPECTFULLY SUBMITTED** this 9th day of June 2023.

9
10 **ENARA LAW, PLLC**

11 By: /s/ George Chebat

12 George Chebat
13 Joseph J. Toboni
14 Daniel de Julio
15 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of June 2023, copy of the foregoing was transmitted electronically to the CM/ECF filing system for filing and transmittal along with copies transmitted to all counsel of record via the CM/ECF system.

By: /s/ Shelly N. Witgen, ACP